

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Numbering Resource Optimization

CC Docket No. 99-200

COMMENTS OF VERIZON

Verizon¹ generally supports the number pooling rollout plan proposed by the Commission in its Public Notice. However, because that schedule does not take into account certain previously scheduled state pooling trials, Verizon proposes that the schedule be modified as suggested below. In addition, the detailed implementation schedule for the first quarter should also be changed to more closely reflect schedules actually used by the states and the industry in the numerous trials that have been successfully implemented.

As a preliminary matter, Verizon notes that the proposed schedule is inconsistent with the guidelines adopted by the Commission for national number pooling rollout. In its initial order in this proceeding, the Commission held, “The schedule for each quarter will contain three NPAs from each of the seven NPAC regions that are within the largest 100 MSAs.”² The proposed schedule often deviates from that requirement. For example, the second quarter includes five NPAs in the midwest region, the fifth has seven in the midwest, the sixth has seven in the west and the seventh has ten in the southeast. The fact

¹ The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc., listed in Attachment A.

² *Numbering Resource Optimization*, 15 FCC Rcd 7574 ¶ 161 (2000) (“*First Order*”).

that the schedule may be lighter than three NPAs per quarter in some parts of the country, of course, does not make it any easier to get the work done to do more than three implementations per quarter elsewhere. However, Verizon can accommodate the schedule as proposed, as long as the Commission does not add any additional NPAs later.

In this connection, the Notice asks for states to indicate if they want to “opt in” to this initial implementation schedule. Such opt ins should be permitted only to fill a slot that has been opened up by another state opting out of the national schedule. As the Commission stated in its initial order, “We will accommodate such requests, however, in instances where space is available on the schedule due to an opening created by a state’s opting out.”³ In that order, the Commission also indicated that it would also consider opt-in requests “in demonstrated special circumstances, if the Pooling Administrator can accommodate the request in addition to the twenty-one scheduled implementations.”⁴ At this point, Verizon is not aware of any “special circumstances” that would justify adding to the schedule. Especially where regions already have more than three NPAs in a quarter, it should not be possible to accommodate additional implementations.

The proposed schedule does not take into account all the state pooling trials in the northeast region. Massachusetts has scheduled a pooling trial in the 617 NPA for April 1, 2002, which should be added to the Commission’s proposed schedule. With this addition, Verizon would recommend the schedule be amended by moving the Rhode Island 401 NPA to a June 1, 2002 start.

³ *First Order* ¶ 164.

⁴ *Id.*

Verizon understands that all existing state pooling trials, both voluntary and mandatory, are required to conform to the national framework and that all these trials will be transitioned to the national pooling administrator at the beginning of the national roll-out. If this is not the case, then it will be necessary to add 717/570 in Pennsylvania to the national rollout early in the schedule.

Attachment A to the Notice sets out a detailed proposed schedule for the first quarter. While this proposal is a good start, there are a number of ways to improve it, based upon the industry's experience to date implementing pooling.

First, the schedule allows about 90 days between the first implementation meeting and the pooling start date. This period is usually closer to 120 days in Verizon's experience, and that time is necessary to get all the work done.

Second, the schedule provides for a separate implementation meeting for each NPA in a region. It would be more efficient to have a single implementation meeting per region per quarter, especially in those quarters that have five or seven or ten NPAs scheduled in a region, and this procedure is consistent with the approved industry guidelines.⁵

Third, this schedule has the Forecast, Block Protection and Block Donation Identification all on the same date, with Block Donation occurring seven weeks later. Verizon believes that it would be preferable to allow the industry to work out these details on an NPA-by-NPA basis, as they have been doing for many months, and for the Commission to prescribe only the first meeting and pool start dates. However, if the Commission wants to prescribe detailed schedules, the one in the Notice is not the way the

⁵ Industry Numbering Committee, Thousands-Block Number (NXX-X) Pooling Administration Guidelines ¶ 7.2.2, dated September 24, 2001.

industry has been implementing pooling in the state trials and is not a logical way to proceed. It is also inconsistent with the INC pooling guidelines to have Block Protection and Block Donation Identification occur on the same date:

“The time interval from when SPs protect thousands-blocks (Block Protection Date) to when they identify thousands-blocks for donation to the PA (Block Donation Identification Date) requires considerable verification work by SPs so that all available TNs are identified (see Section 7.2.6). The length of this interval should depend upon the quantity of contaminated thousands-blocks to be donated.”⁶

Verizon would suggest starting with the Forecast, to be followed by the Block Protection Date approximately a week later, with Block Donation Identification about four weeks after that, and Block Donation three weeks after that.

The proposed schedule lists NPAs, and states that “number pools will be established in approximately 21 numbering plan areas per quarter.” Verizon understands this to require that pools are to be established throughout the NPA, not merely in the rate centers that are within one of the top 100 MSAs. Any other procedure would be wasteful and duplicative. If the pool covered only some of the rate centers, then the industry would have to come back at some later time to complete the job. It would also delay the benefits of pooling to those non-MSA parts of the NPA, even though pooling could be easily implemented at the outset. This is the way that virtually all states have implemented pooling in Verizon’s experience, and Verizon asks that the Commission confirm its interpretation of the schedule.

⁶ Industry Numbering Committee, Thousands-Block Number (NXX-X) Pooling Administration Guidelines ¶ 7.2.4, dated September 24, 2001.

Verizon, therefore, requests that the Commission quickly issue a final schedule incorporating the modifications and clarifications suggested in these comments so that the industry can begin the national rollout of number pooling.

Respectfully submitted,

/S/

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THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.